

Defendant responds to the numbered paragraphs of the Complaint as follows:

1. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 1 of the Complaint concerning the citizenship of the parties. Therefore, Defendant denies the allegations made.

2. Defendant denies venue is proper in this Court.

3. Defendant does not have information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 3 that this Court has personal jurisdiction over all Defendants. Therefore, denies this allegation. Defendant admits Druien, Inc. is a Texas Corporation who registered agent is Emmett Druien. Defendant denies they had a checking account at First National Bank. Defendant do not have information or knowledge sufficient at this time to form a belief as to the trust of the allegation Lisa Druien notarized at least one assignment as stated in Paragraph 3 of the Complaint. Therefore, denies this allegation. Defendant admits they had contacts with Michael Vernon Garrison d/b/a Rock Hill Used Cars and Austin Michael Garrison a/k/a Mike Garrison d/b/a Austin Financial Services. Defendant is without information or knowledge sufficient at this time to form a belief as to the trust of allegation of the residence and business conduct of Michael Vernon Garrison d/b/a Rock Hill Used Cars and Austin Michael Garrison a/k/a Mike Garrison d/b/a Austin Financial Services. Therefore, denies said allegation.

4. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 4 of the Compliant and therefore denies the allegation(s).

5. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 5 of the Compliant and therefore denies the allegation(s).

6. Defendant admits the allegations made in Paragraph 6 of the Complaint.

7. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 7 of the Complaint and therefore denies the allegation(s).

8. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 8 of the Complaint and therefore denies the allegation(s).

9. Defendant admits the allegations made in Paragraph 9 of the Complaint.

10. Defendant admits the allegations made in Paragraph 10 of the Complaint.

11. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 11 of the Complaint and therefore denies the allegation(s).

12. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 12 of the Complaint and therefore denies the allegation(s).

13. Defendant admits the allegations made in Paragraph 13 of the Complaint.

Responses to allegations relevant to M. Garrison (§§ 14-34)

14. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 14 of the Complaint and therefore denies the allegation(s).

15. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 15 of the Complaint and therefore denies the allegation(s).

16. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 16 of the Compliant and therefore denies the allegation(s).

17. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 17 of the Compliant and therefore denies the allegation(s).

18. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 18 of the Compliant and therefore denies the allegation(s).

19. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 19 of the Compliant and therefore denies the allegation(s).

20. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 20 of the Compliant and therefore denies the allegation(s).

21. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 21 of the Compliant and therefore denies the allegation(s).

22. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 22 of the Compliant and therefore denies the allegation(s).

23. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 23 of the Compliant and therefore denies the allegation(s).

24. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 24 of the Compliant and therefore denies the allegation(s).

25. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 25 of the Compliant and therefore denies the allegation(s).

26. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 26 of the Compliant and therefore denies the allegation(s).

27. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 27 of the Compliant and therefore denies the allegation(s).

28. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 28 of the Compliant and therefore denies the allegation(s).

29. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 29 of the Compliant and therefore denies the allegation(s).

30. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 30 of the Compliant and therefore denies the allegation(s).

31. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 31 of the Compliant and therefore denies the allegation(s).

32. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 32 of the Compliant and therefore denies the allegation(s).

33. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 33 of the Compliant and therefore denies the allegation(s).

34. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 34 of the Compliant and therefore denies the allegation(s).

Responses to allegations relevant to Lawton Auto Auction (§§ 35-61)

35. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 35 of the Compliant and therefore denies the allegation(s).

36. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 36 of the Compliant and therefore denies the allegation(s).

37. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 37 of the Compliant and therefore denies the allegation(s).

38. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 38 of the Compliant and therefore denies the allegation(s).

39. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 39 of the Compliant and therefore denies the allegation(s).

40. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 40 of the Compliant and therefore denies the allegation(s).

41. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 41 of the Compliant and therefore denies the allegation(s).

42. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 42 of the Compliant and therefore denies the allegation(s).

43. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 43 of the Compliant and therefore denies the allegation(s).

44. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 44 of the Compliant and therefore denies the allegation(s).

45. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 45 of the Compliant and therefore denies the allegation(s).

46. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 46 of the Compliant and therefore denies the allegation(s).

47. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 47 of the Compliant and therefore denies the allegation(s).

48. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 48 of the Compliant and therefore denies the allegation(s).

49. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 49 of the Compliant and therefore denies the allegation(s).

50. Defendant admits the allegation in Paragraph 50 of the Complaint.

51. Defendant admits the allegations in Paragraph 51 of the Complaint.

52. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 52 of the Compliant and therefore denies the allegation(s).

53. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 53 of the Compliant and therefore denies the allegation(s).

54. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 54 of the Compliant and therefore denies the allegation(s).

55. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 55 of the Compliant and therefore denies the allegation(s).

56. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 56 of the Compliant and therefore denies the allegation(s).

57. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 57 of the Compliant and therefore denies the allegation(s).

58. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 58 of the Compliant and therefore denies the allegation(s).

59. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 59 of the Compliant and therefore denies the allegation(s).

60. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 60 of the Complaint and therefore denies the allegation(s).

61. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 61 of the Complaint and therefore denies the allegation(s).

Responses to allegations relevant to “Fraudulent“ Insider Sales (§§ 62-80)

62. Defendant denies the allegations in Paragraph 62 of the Complaint. Defendant further denies Plaintiff’s implication they are parties to any fraud as suggested by the Plaintiff’s description of vehicles as Insider Fraud Vehicles.

63. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 63 of the Complaint, therefore Defendant denies the allegations.

64. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 64 of the Complaint, therefore Defendant denies the allegations.

65. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 65 of the Complaint, therefore Defendant denies the allegations.

66. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 66 of the Complaint, therefore Defendant denies the allegations.

67. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 67 of the Complaint, therefore Defendant denies the allegations.

68. Defendant denies the allegations in Paragraph 68 of the Complaint. Defendant further denies Plaintiff's assertion there was collusion between the defendants.

69. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 69 of the Complaint, therefore Defendant denies the allegations.

70. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 70 of the Complaint, therefore Defendant denies the allegations.

71. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 71 of the Complaint, therefore Defendant denies the allegations.

72. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 72 of the Complaint, therefore Defendant denies the allegations.

73. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 73 of the Complaint, therefore Defendant denies the allegations.

74. Defendant denies the allegations in Paragraph 74 of the Complaint.

75. Defendant denies the allegations in Paragraph 75 of the Complaint.

76. Defendant is without information or knowledge, sufficient at this time to form a belief as to the truth of the allegations in Paragraph 76 of the Complaint, therefore Defendant denies the allegations.

77. Defendant denies the allegations in Paragraph 77 of the Complaint.

78. Defendant denies the allegations in Paragraph 78 of the Complaint.

79. Defendant denies the allegations in Paragraph 79 of the Complaint.

80. Defendant denies the allegations in Paragraph 80 of the Complaint.

Responses to allegations relevant to M. Garrison (§§ 81-100)

81. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 81 of the Complaint and therefore denies the allegation(s).

82. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 82 of the Complaint and therefore denies the allegation(s).

83. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 83 of the Complaint and therefore denies the allegation(s).

84. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 84 of the Complaint and therefore denies the allegation(s).

85. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 85 of the Complaint and therefore denies the allegation(s).

86. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 86 of the Compliant and therefore denies the allegation(s).

87. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 87 of the Compliant and therefore denies the allegation(s).

88. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 88 of the Compliant and therefore denies the allegation(s).

89. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 89 of the Compliant and therefore denies the allegation(s).

90. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 90 of the Compliant and therefore denies the allegation(s).

91. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 91 of the Compliant and therefore denies the allegation(s).

92. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 92 of the Compliant and therefore denies the allegation(s).

93. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 93 of the Compliant and therefore denies the allegation(s).

94. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 94 of the Compliant and therefore denies the allegation(s).

95. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 95 of the Compliant and therefore denies the allegation(s).

96. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 96 of the Compliant and therefore denies the allegation(s).

97. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 97 of the Compliant and therefore denies the allegation(s).

98. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 98 of the Compliant and therefore denies the allegation(s).

99. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 99 of the Compliant and therefore denies the allegation(s).

100. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 100 of the Complaint and therefore denies the allegation(s).

Responses to allegations relevant to Lawton Auto Auction (§§ 101-128)

101. Defendant admits the allegations made in Paragraph 101 of the Complaint.

102. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 102 of the Complaint and therefore denies the allegation(s).

103. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 103 of the Complaint and therefore denies the allegation(s).

104. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 104 of the Complaint and therefore denies the allegation(s).

105. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 105 of the Complaint and therefore denies the allegation(s).

106. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 106 of the Complaint and therefore denies the allegation(s).

107. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 107 of the Complaint and therefore denies the allegation(s).

108. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 108 of the Compliant and therefore denies the allegation(s).

109. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 109 of the Compliant and therefore denies the allegation(s).

110. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 110 of the Compliant and therefore denies the allegation(s).

111. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 111 of the Compliant and therefore denies the allegation(s).

112. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 112 of the Compliant and therefore denies the allegation(s).

113. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 113 of the Compliant and therefore denies the allegation(s).

114. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 114 of the Compliant and therefore denies the allegation(s).

115. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 115 of the Compliant and therefore denies the allegation(s).

116. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 116 of the Compliant and therefore denies the allegation(s).

117. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 117 of the Compliant and therefore denies the allegation(s).

118. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 118 of the Compliant and therefore denies the allegation(s).

119. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 119 of the Compliant and therefore denies the allegation(s).

120. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 120 of the Compliant and therefore denies the allegation(s).

121. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 121 of the Compliant and therefore denies the allegation(s).

122. Defendant denies the allegations in Paragraph 122 of the Complaint.

123. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 123 of the Complaint and therefore denies the allegation(s).

124. Defendant denies the allegations in Paragraph 124 of the Complaint.

125. Defendant denies the allegations in Paragraph 125 of the Complaint.

126. Defendant denies the allegations in Paragraph 126 of the Complaint.

127. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 127 of the Complaint and therefore denies the allegation(s).

128. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 128 of the Complaint and therefore denies the allegation(s).

Responses to allegations relevant to Sale of AFC Vehicles (§§ 129-147)

129. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 129 of the Complaint and therefore denies the allegation(s).

130. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 130 of the Complaint and therefore denies the allegation(s).

131. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 131 of the Complaint and therefore denies the allegation(s).

132. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 132 of the Compliant and therefore denies the allegation(s).

133. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 133 of the Compliant and therefore denies the allegation(s).

134. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 134 of the Compliant and therefore denies the allegation(s).

135. Defendant denies the allegations in Paragraph 135 of the Complaint.

136. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 136 of the Compliant and therefore denies the allegation(s).

137. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 137 of the Compliant and therefore denies the allegation(s).

138. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 138 of the Compliant and therefore denies the allegation(s).

139. Defendant denies the allegations in Paragraph 139 of the Complaint.

140. Defendant denies the allegations in Paragraph 140 of the Complaint.

141. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 141 of the Compliant and therefore denies the allegation(s).

142. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 142 of the Compliant and therefore denies the allegation(s).

143. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 143 of the Compliant and therefore denies the allegation(s).

144. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 144 of the Compliant and therefore denies the allegation(s).

145. Defendant denies the allegations in Paragraph 145 of the Complaint.

146. Defendant denies the allegations in Paragraph 146 of the Complaint.

147. Defendant denies the allegations in Paragraph 147 of the Complaint.

Responses to allegations relevant to Attorneys' Fees (§§ 148-150)

148. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 148 of the Compliant and therefore denies the allegation(s).

149. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 149 of the Compliant and therefore denies the allegation(s).

150. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 150 of the Compliant and therefore denies the allegation(s).

Count I

Breach of Contract (NG v. Garrison)

151. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 151 of the Compliant and therefore denies the allegation(s).

152. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 152 of the Compliant and therefore denies the allegation(s).

Count II

Breach of Contract (NG v. LAA)

153. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 153 of the Compliant and therefore denies the allegation(s).

154. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 154 of the Compliant and therefore denies the allegation(s).

Count III

Breach of Contract (AFC v. Garrison)

155. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 155 of the Compliant and therefore denies the allegation(s).

156. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 156 of the Compliant and therefore denies the allegation(s).

Count IV

Breach of Contract (AFCV v. LAA)

157. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 157 of the Compliant and therefore denies the allegation(s).

158. Defendant denies the allegations in Paragraph 158 of the Complaint.

Count V

Conversion (NG v. Garrison)

159. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 159 of the Compliant and therefore denies the allegation(s).

160. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 160 of the Compliant and therefore denies the allegation(s).

161. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 161 of the Compliant and therefore denies the allegation(s).

Count VI

Conversion (AFC v. Garrison)

162. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 162 of the Compliant and therefore denies the allegation(s).

163. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 163 of the Compliant and therefore denies the allegation(s).

164. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 164 of the Compliant and therefore denies the allegation(s).

Count VII

Fraud (NG v. LAA, Lisa and Emmett Druien)

165. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 165 of the Compliant and therefore denies the allegation(s).

166. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 166 of the Compliant and therefore denies the allegation(s).

Count VIII (Marked as IX)

Fraud (AFC v. LAA, Emmett and Lisa Druien)

167. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 167 of the Compliant and therefore denies the allegation(s).

168. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 168 of the Compliant and therefore denies the allegation(s).

Count IX

Conspiracy to Commit Fraud (NG v. LAA, Emmett and Lisa Druien)

169. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 169 of the Compliant and therefore denies the allegation(s).

170. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 170 of the Compliant and therefore denies the allegation(s).

171. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 171 of the Compliant and therefore denies the allegation(s).

172. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 172 of the Compliant and therefore denies the allegation(s).

173. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 169 of the Compliant and therefore denies the allegation(s).

174. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 174 of the Compliant and therefore denies the allegation(s).

Count X

Conspiracy to Commit Fraud (NG v. LAA, Emmett and Lisa Druien)

175. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 175 of the Compliant and therefore denies the allegation(s).

176. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 176 of the Compliant and therefore denies the allegation(s).

177. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 177 of the Compliant and therefore denies the allegation(s).

178. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 178 of the Compliant and therefore denies the allegation(s).

179. Defendant is without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 179 of the Compliant and therefore denies the allegation(s).

180. Paragraph 180 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendant denies Plaintiffs are entitled to the relief they seek.

Count XI

Exemplary Damages (AFC & NG v. LAA, Emmett and Lisa Druien & Garrison)

181. Paragraph 181 of the Complaint sets forth no allegations to which a response is required.

182. Paragraph 182 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendant denies Plaintiffs are entitled to the relief they seek.

PRAYER

Defendant pray the Court, after notice and hearing or trial, enters judgment in favor of Defendant and/or dismissal of the Plaintiffs' claims with prejudice, awards Defendant the costs of court, attorney's fees, and such other and further relief as Defendant may be entitled to in law or in equity.

Respectfully submitted,

Bailey & Galyen
1300 Summit Avenue, Suite 650
Fort Worth, Texas 76102
Tel. (817) 276-6000
Fax. (817) 276-6010

/s/ Richard Fiory Tallini
Richard Fiory Tallini
Texas Bar No. 24093548
Email: CivilLaw@galyen.com

Attorney for Defendants Druien, Inc. d/b/a
Lawton Auto Auction a/k/a Lawton Cache
Auto Auction, Lisa Druien, and Emmett
Druien

CERTIFICATE OF SERVICE

This is to certify that on June 8, 2021, a true and correct copy of the foregoing Answer To Plaintiffs' Second Amended Complaint has been forwarded to defendant M. Garrison, pro se, at 549 I-30 E., Sulphur Springs, Texas 75482, via certified mail, return receipt requested, and NextGear and AFC by and through their counsel of record, Alan B. Padfield and Christopher V. Arisco of Padfield & Stout, L.L.P., 420 Throckmorton Street, Suite 1210, Fort Worth, TX 76102, via ECF and by email to abp@padfieldstout.com carisco@padfieldstout.com.

/s/ Richard Fiory Tallini
Richard Fiory Tallini